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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

PETER TODD, an individual,

Plaintiff,

v.

SARAH MICHELLE REICHWEIN *aka* **ISIS
AGORA LOVECRUFT**, an individual,

Defendant.

Case No. 4:19-cv-01751-DMR

**DECLARATION OF PETER TODD IN
SUPPORT OF PLAINTIFF'S MOTION
FOR LEAVE TO SERVE SUMMONS
AND COMPLAINT ON DEFENDANT
BY ALTERNATIVE MEANS OR IN THE
ALTERNATIVE TO EXTEND TIME TO
COMPLETE SERVICE**

Date: June 27, 2019
Time: 11:00 a.m.
Ct rm: 3 – 4th Floor
Before: Hon. Donna M. Ryu



I, Peter Todd, declare as follows:

1. I am the plaintiff in the above-captioned matter. Unless otherwise stated, I have personal knowledge of the matters set forth herein.

2. I am personally acquainted with Defendant. Based on my past interactions with Defendant, I understand that Defendant is a highly private person who publicly identifies themselves by their pseudonym, Isis Agora Lovecraft.

3. Before filing this lawsuit, I did not know Defendant's legal name. As such, I authorized my attorneys to engage a private investigator to research Defendant's legal name solely for the purpose of bringing this lawsuit.

4. For many reasons (including because Defendant is extremely private; because Defendant is active on Twitter; and because of the communicative nature of the cryptography community of which Defendant and I are a part), I suspected that Defendant would quickly learn about this lawsuit and attempt to evade service.

5. Prior to filing this lawsuit, I exchanged several emails with Defendant, where Defendant used the email address "isis@patternsinthevoid.net." Defendant provided this email address to me. Defendant acknowledged their receipt of emails from me at this address, and Defendant sent emails to me from this address.

6. Based on my interactions with Defendant and Defendant's personal acquaintances, I understand that Nicole Aptekar and Henry de Valence are close personal acquaintances of Defendant.

7. As of the date of this declaration, I do not know where Defendant is residing, and I do not know any other lawful tools that could be used to try to identify Defendant's residence.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on May 8th 2019

Peter Todd
Peter Todd